Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	CC Docket No. 95-116
Telephone Number Portability	)	RM 8535

REPLY COMMENTS OF GTE

GTE SERVICE CORPORATION, on behalf of its affiliated domestic telephone and wireless operating companies

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SUMMARY

The results reflected in the customer survey report prepared for GTE demonstrate that once the potential costs of number portability are considered, GTE's non-geographic number portability solution emerges as the optimal form of portability. The results indicate that (1) the demand for number portability drops precipitously as its price increases, (2) customers are not as averse to non-geographic number portability as some may wish the Commission to believe, and (3) customers have serious concerns regarding the potential loss of the geographic significance of numbers as they know them. GTE's number portability solution effectively addresses each of these concerns. GTE's proposal will result in more consumers opting for number portability because of its significantly lower implementation cost. In addition, the distinct non-geographic NPA will alleviate consumer confusion regarding the loss of the geographic significance of existing numbers.

There can be no dispute that the Commission cannot fully resolve the number portability issue until all of the potential costs associated with each portability proposal have been determined. Aside from GTE, none of the other commenters provided cost estimates for any of the other portability plans. Thus, it is not surprising that numerous commenters urged the Commission to adopt an every-man-for-himself approach to cost recovery, safe in the assumption that in this way, the lion's share of number portability costs will be forced on to the LECs. Some commenters also urge the Commission to require LECs to provide interim number portability services free of charge. There is no justifiable reason

for shifting the costs, both in the short term and in the long term, on LECs in this way. These suggestions are patently self-serving and unfair, and must be rejected.

In assessing alternative number portability proposals, the Commission must also take into account the non-monetary costs of each approach, such as its impact on overall network reliability and the ability of the proposal to transition to the location portability needed for competitively neutral portability. Interim number portability solutions other than remote call forwarding or direct inward dialing should only be considered if they are able to facilitate an economically efficient transition to the long term number portability solution.

Because of the dearth of cost data presented in the opening comments, it appears necessary to establish an advisory board or industry group to gather this information under the close scrutiny and direction of the Commission. GTE is confident that effective Commission oversight will ensure that this effort is completed in an timely fashion. Finally, there is a consensus, of which GTE is a part, that the Commission must take a leading role in guiding the industry toward a uniform national number portability architecture.

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GTE Service Corporation ("GTE"), on behalf of its affiliated domestic telephone and wireless operating companies, submits the following comments in reply to the initial comments filed in response to the Commission's July 13, 1995 Notice of Proposed Rulemaking ("NPRM") focusing on the issue of telephone number portability.

I. GTE'S NUMBER PORTABILITY SURVEY RESULTS DEMONSTRATE THAT ONCE COSTS ARE FACTORED IN, GTE'S NON-GEOGRAPHIC NUMBER PORTABILITY SOLUTION OFFERS THE OPTIMAL FORM OF PORTABILITY

GTE commissioned Travis Research Associates, Inc. ("Travis") to conduct a survey of GTE customers randomly drawn from all of the areas served by GTE (currently encompassing 28 states). A customer sampling was also taken from areas served by four Regional Bell Operating Companies in order to obtain a rough gauge of the relative consistency of the GTE results. The purpose of the survey was to obtain information regarding the potential customer demand for number portability.[1] As discussed below, the results in the survey report

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[1] In this respect, GTE shares the belief of the Missouri Public Service Commission "that the lack of known or demonstrated demand for geographic portability is

prepared by Travis ("Travis Report") demonstrate that once the element of cost is injected into customers' decisionmaking process, GTE's less costly non-geographic number portability solution emerges as the optimal form of number portability.[2]

a. Customers Exhibit a High Degree of Price Elasticity Regarding Number Portability.

It should come as no surprise that a majority of customers would like number portability. If they did not have to pay for it, 66% of residential customers would prefer full number portability (*i.e.*, keeping their number and never having to change it for any reason) over the current situation, while 52% would prefer non-geographic number portability of the type proposed by GTE. However, once price enters the equation, these percentages drop considerably. If a 5% increase in the basic monthly rate were required, only 36% would prefer full number portability and only 32% would still prefer non-geographic number portability. At a 10% increase, the respective percentages drop to 21% and 20%. The trend continues as prices continue to increase.[3]

In addition, the results indicate that customers are only willing to tolerate a modest additional monthly amount in order to be able to have the option of keeping their telephone numbers should they move in the future. 44% of

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especially troubling." Comments of MPSC at 3. (A listing of the abbreviations for commenting parties appears in Appendix A.)

2 Conjoint analysis was used in evaluating the data obtained. For a more detailed discussion of the research methodology, see pages 5 through 8 of the Travis Report which is attached hereto as Exhibit 1.

3 Travis Report at pp. 21-23.

residential customers and 64% of business customers are willing to pay an additional 50 cents per month. When the amount increases to $1.00, these percentages drop to 32% and 45% respectively. Only 12% of residential customers and 24% of business customers are willing to pay $2.50.[4]

These results send a very powerful message: Although customers may desire number portability, there are clearly limits to what they are willing to pay for it. This conclusion highlights the importance of the discussion in Section II below regarding the lack of cost data generated in this proceeding thus far.

b. Customers Generally Are Not as Averse to Non-Geographic Number Portability As Some May Wish the Commission to Believe.

A number of commenters have summarily dismissed GTE's non-geographic number portability solution from consideration because it would require a one-time number change to a portable number.[5] The survey results indicate, however, that when the basic monthly rate needed to pay for full geographic number portability is just 2-1/2% higher than the rate needed to pay for non-geographic number portability, residential customers are just as likely to choose one form of portability as the other.[6]

These results are compelling evidence that in the end, GTE's non-geographic number portability may prove to be the optimal alternative. Since all

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4 *Id.* at pp. 32-33.

5 *See, e.g.,* Comments of TWC at Appendix B, p. 7; CPUC at 6.

6 Travis Report at p. 28-29; the differential required for business customers is approximately 8% (pp. 30-31)..

other proposals are significantly more costly than GTE's solution, considerably more customers will opt for the type of number portability offered under GTE's solution. Thus, GTE's lower cost proposal will contribute more to local exchange competition than the other proposals. These results directly refute any contention that a one-time number change will serve as an insurmountable hurdle to customers changing local service providers.[7] The Commission cannot and must not overlook this important fact.

c. Customers Have Serious Concerns Regarding the Potential Loss of the Geographic Significance of Telephone Numbers.

The Travis Survey asked respondents to indicate their level of concern regarding the possibility of making phone calls to telephone numbers that have lost their geographic significance. When NPAs are no longer reliable indicators of toll calls, the overwhelming majority of residential (86%) and business (78%) customers believe that it is very important to know whether they were incurring long distance or toll charges in making such calls.[8] A total of 50% from each category believe that it would be very important to know where the called party is located. A significant percentage from each category (38% and 44%

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7 *See, e.g.,* Comments of GO at 6-7 (GTE's "plan would do nothing to enhance local competition as it would not allow new entrants in the local market to gain customers without overcoming a significant hurdle; the customer having to change its telephone number"); MFS at 10 ("Since customers in survey after survey have said that they would be disinclined to switch to a new carrier's services if they had to change to a new geographic number in the process, there is no reason to suspect they would be any more willing to change to a new non-geographic number.")

8 Travis Report at pp. 37-39.

respectively) also believe that it is very important to know the time of day or night at the location being called.

These results further support GTE's non-geographic number portability solution. GTE's solution would result in less consumer confusion. This is because a caller dialing a non-geographic number (*i.e.,* one with a distinctive NPA such as 300) knows that the number is portable (*i.e.,* that it has been ported to another location or carrier) and therefore can take the steps necessary to obtain additional information regarding toll charges, location or time of day before dialing it.[9] Moreover, under GTE's proposal, callers can rest assured that geographic numbers can be relied upon to provide the same location information as they have in the past.

With other portability schemes, there is nothing distinctive about the number to indicate whether or not it has been ported to another location. Thus, callers will have to take additional steps to obtain information on almost every number prior to calling if they are concerned about toll charges, etc. This added burden may increase the likelihood of customer resistance to this form of portability.

In the end, if number portability is to be truly in the public interest, the added benefit flowing from the distinctive portable number of GTE's LNP solution cannot be overlooked.

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[9] In addition, under GTE's portability solution, the caller would be provided with an announcement that the dialed numbers will result in a toll charge. *See* Comments of GTE at 13.

II. THE COMMENTS ARE BEREFT OF THE COST DATA CRITICALLY NEEDED BY THE COMMISSION TO RESPONSIBLY EVALUATE THE VARIOUS NUMBER PORTABILITY PROPOSALS

There is no dispute that the costs associated with a long term number portability solution will be considerable. When coupled with the projected price elasticity of customer demand for number portability discussed above, it becomes irrefutably clear that the question of cost must be answered for each and every portability proposal before any number portability architecture can be selected. At each step in its NPRM, the Commission made its concern regarding potential costs unequivocal. With respect to interim portability measures other than Remote Call Forwarding ("RCF") and Direct Inward Dialing ("DID"), the Commission stated:

> We seek comment *on the cost*, and offsetting benefits, of implementing these [alternative] interim measures.[10]

Looking beyond interim measures to the potential transition to a longer-term solution, the Commission reiterated its concern:

> In order to weigh the public interest benefits of deploying a longer-term number portability solution against the current interim measures, *we must consider the costs* associated with designing, building, and deploying such a longer-term solution.[11]

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10 NPRM at ¶ 62 (emphasis added).

11 NPRM at ¶ 53 (emphasis added); *see also* ¶ 68 ("To determine what would best serve the public interest, we seek comment comparing the relative costs and benefits associated with the current interim solutions to the costs and benefits associated with alternative longer-term solutions . . . We also seek comment on the additional costs that would be incurred, and the benefits that would be attained, by evolving to location portability from an intermediate step of service provider portability.").

In discussing its non-geographic LNP solution, GTE provided its best estimate of what it would cost GTE to implement its own plan.[12] GTE then compared that cost (approximately $35 million) with the estimated cost of implementing an AT&T-like plan in all of its service areas (approximately $1.65 billion).[13] GTE does not contend that these estimates are absolutely precise, but it does believe that they are well in the ballpark. At the very least, these estimates allow the Commission to evaluate cost as a factor in weighing the relative merits of GTE's LNP solution. Regrettably, despite the Commission's repeated request for this type of information, the other comments are virtually devoid of any similar cost estimates.

Even the proponents of specific number portability proposals failed to provide estimates of the costs associated with their plans. In discussing its Location Routing Number ("LRN") proposal, AT&T simply asserts that "the costs of number portability are justified and far outweighed by the benefits that a competitive local exchange will produce."[14] In a footnote, AT&T does make

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12 Because each LEC network is uniquely structured, GTE was not able to estimate the costs to other LECs of implementing GTE's plan; however, GTE firmly believes that its estimate is in the ballpark for other LECs of its size.

13 GTE Comments at 14.

14 AT&T Comments at 32-33. Despite AT&T's belief that competition will be the panacea for all cost recovery ills, this may not, in fact, be the case. Not everyone will benefit equally from number portability. It is likely, for example, that users in extremely remote serving areas will have few competitive choices for some time to come. Clearly then, those users with a choice who take advantage of number portability will receive far greater benefits. If all telecommunication providers are forced to invest billions of dollars to implement number portability, the basic cost of telecommunication services obviously will increase. Accordingly, any benefits from competition will have to overcome this increase before those users who do not use this feature realize a net benefit.

cryptic reference to "reasonable estimates of number portability, using documented costs of 800 portability as a baseline," which suggest that total costs are "between $1 billion and $2 billion."[15] Unfortunately, AT&T does not identify the source of the "reasonable estimates" or whether those estimates are even in the ballpark for its LRN proposal. It appears that AT&T makes this passing reference only to make its curious point that the higher estimate of $2 billion would only "represent less than 1/2 of 1% of total local exchange carrier plant."[16]

In a similar fashion, MCI speaks to the cost issue in only the most general of terms when discussing its Carrier Portability Code ("CPC") proposal. MCI observes that "[t]hose solutions which make the best use of current technologies should prove to be the most cost effective."[17] It then concludes that "the combination of CPC-LRN meets that objective."[18] No cost estimates or other data are provided to support this conclusion.[19]

The position taken by other non-LEC commenters is not much different. Many urge the Commission to establish immediate timeframes for the

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Only after competitive pressures reduce prices beyond the stepped-up costs caused by number portability will the majority of users truly benefit.

15 *Id.* at 33, fn. 36.

16 *Id.*

17 MCI Comments at 20.

18 *Id.*

19 The concern regarding cost is only compounded by the proposal of AT&T and MCI that both of their plans be adopted, MCI's CPC plan for the short term and AT&T's LRN plan for the long term. *See* Comments of AT&T at 31; MCI at 15. For the reasons discussed in Section V below, GTE does not believe that a transition from CPC to LRN will be economically efficient.

implementation of number portability while sidestepping the issue of cost completely. For example, Teleport pushes the Commission to "require all carriers to provide SPNP [Service Provider Number Portability] in the top 100 markets no later than 24 months after the issuance of an order in this proceeding."[20] As to the associated costs, Teleport merely concedes that "[t]he total costs of number portability cannot be determined by the Commission at this time."[21] Ad Hoc makes the same demand for portability in the top 100 MSAs within 24 months of an order.[22] As to costs, however, Ad Hoc merely admonishes the Commission to "place a heavy burden on *LECs* to justify their estimates of the costs of number portability."[23] Citizens believes that 18 months should be sufficient for the deployment of "database-supported number portability solutions providing at least service provider portability."[24] Potential costs are not discussed. It bears noting that none of these commenters base their deadline on any particular portability architecture or even attempt to explain how their deadline was formulated.

It is telling that those commenters giving short shrift to the potential costs associated with LNP are also the most adamant when it comes to cost recovery.

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20 Comments of Teleport at 12.

21 *Id.* at 13.

22 Comments of Ad Hoc at 15.

23 *Id.* at 22 (emphasis added).

24 Comments of Citizens at 8.

Not surprisingly, these commenters argue that each carrier should bear its own costs of implementing number portability.[25] Given the fact that the LECs ultimately will have the lion's share of implementation costs because of the modifications required to their networks, the intent behind this every-man-for-himself approach to cost recovery is clearly to ensure that the bulk of LNP costs are shouldered by the LECs. The Commission must reject such an unfair and self-serving proposition.

In addition to the attempts to shift the bulk of the long term portability costs to LECs, some commenters also urge the Commission to force the LECs to bear the full cost of number portability in the short term. For example, Time Warner asserts that LECs should be forced "to provide the CLECs' choice of RCF, DID or enhanced DID free of charge" until "true service provider portability" is implemented.[26] Time Warner argues that free services are required to make up for the "disadvantages" of these interim approaches and to give "some incentive for LECs to implement database solutions."[27] NCTA demands free

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25 *See, e.g.*, Comments of AT&T at 36 ("each carrier should bear the costs of upgrading its own network"); Citizens at 10 ("each carrier should recover its own costs to deploy local number portability"); Teleport at 13 ("all costs of number portability implementation [should be] borne by the carriers that incur them"); TWC at 23 ("fairest and most efficient approach to cost recovery is . . . for each carrier to absorb its own number portability costs").

26 Comments of TWC at 21-22.

27 *Id.* at 21.

interim portability because existing interim solutions are "impediments to full and fair local exchange competition."[28]

These patently self-serving demands should also be rejected. First, if the costs of number portability are to be equitably borne by all carriers (or all customers), then it makes no sense for LECs (or their customers) to be saddled with all of the costs in the near term through the provision of free interim portability.

Second, any notion that the provision of free services will create a disincentive for LECs to "drag their feet" must be tempered by the very real potential for free services to cause ALECs to "drag their feet" down the line. If ALECs are obtaining interim portability, which would be transparent to their customers, free of charge, how much incentive will they have to move quickly to a long term solution if significant capital investments are required? It is not unlikely that these carriers will be more inclined to put off long term portability as long as they can in order to continue focusing their resources on their primary goal of obtaining as many new customers as possible.

Finally, many states have already resolved or are close to resolving the issues associated with interim portability, including rates, in connection with local competition dockets. The states should continue to be allowed to determine, based upon local market and other conditions, what rates are fair for interim

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[28] Comments of NCTA at 12-13; still others demand substantial discounts on interconnection services until "full" number portability is available. *See* Comments of ALTS at 14 (50% reductions); Teleport at 15 ("interconnection charges should be significantly discounted").

portability services. A blanket Commission preemption requiring free interim portability services across the nation is unnecessary and, in the long term, could be counterproductive.

III. A COMPLETE ASSESSMENT OF THE COSTS ASSOCIATED WITH NUMBER PORTABILITY CANNOT NOT BE LIMITED SOLELY TO MONETARY EXPENDITURES

As GTE noted in its opening comments, the type of number portability ultimately adopted could have a profound impact on the way each and every call is processed within the public switched network ("PSN"). Although the potential monetary outlays to implement the required changes to the PSN are a critical element of overall costs, they are not the only factor. The cost of number portability in terms of its impact on network reliability must also be considered. Thus, an assessment of costs must also take into account the non-monetary impacts such as degradation in the quality of calls, increased time for call set-up and the increased potential for network outages and broader network failures.[29]

IV. SERVICE PROVIDER PORTABILITY CANNOT BE SEPARATED FROM LOCATION PORTABILITY IF A COMPETITIVELY NEUTRAL FORM OF NUMBER PORTABILITY IS TO BE ACHIEVED

BellSouth notes that

> any interim or long term solution to number portability must include a built-in capability for location portability so that all carriers may respond to such demand as it may arise. Consumers already have a level of location portability limited to the geographic area served by the central office related to the consumer's central office code. New entrants are expected to service larger geographic areas comprising

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[29] A detailed discussion of the potential impact of number portability implementation on other functions in the PSN appears in GTE's opening comments at pages 18 through 21.

> several existing central office areas which will naturally expand the area over which these entrants can offer location portability. This, in turn may create a new demand for expanded location portability."[30]

GTE agrees. Parties that support a stand-a-lone service provider portability solution fail to see that there will always be location portability issues involved in these service provider solutions because of the way competitive networks are configured. Upon examination, it quickly becomes obvious that the existing wire center geographic areas of competing service providers have little in common with each other. In general, a LEC's network reflects a design that was driven by the technology and economics that existed at the time it was constructed. New competitors will similarly design their networks to take maximum advantage of today's technology (e.g., fiber optics, radio, etc.) such that, as BellSouth states, the new competitors will be able to offer a much greater area in which customers may retain their number than the LECs' existing networks will permit.

The Commission must not permit a service provider portability solution that, in practice discriminates against any service provider, including the LEC. While many of the solutions proposed have addressed the routing of calls when a customer switches from a LEC to a new service provider, a competitively neutral solution must also address the issues that arise when a customer moves from a new service provider to a LEC. In this regard, GTE's non-geographic number solution is the only proposal that efficiently and effectively provides both

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[30] Comments of BellSouth at 8.

unrestricted location portability and service provider portability upon implementation.

V. ALTERNATIVE INTERIM NUMBER PORTABILITY SOLUTIONS SHOULD ONLY BE CONSIDERED IF THEY ARE ABLE TO FACILITATE AN ECONOMICALLY EFFICIENT TRANSITION TO LONG TERM NUMBER PORTABILITY

A number of commenters urge the Commission to adopt an interim portability plan other than RCF or DID. For example, Time Warner believes that existing IN and AIN technology can support "true number portability" in the "medium term."[31] As a general matter, GTE is not opposed to alternative interim portability plans. GTE does believe, however, that such alternatives have the potential of generating a significant new layer of costs and diverting critical industry resources needed to proceed as swiftly as possible to the ultimate goal of long term number portability.

In addition, any alternative interim plan would have to be devised very carefully in order to assure an economically efficient transition to the long term portability solution. Under no circumstances should the industry be required to abandon investments required for an interim solution in order to implement the long term solution. Although Time Warner asserts that "longer term solutions will build on medium term solutions and will not generally require carriers to

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31 Comments of TWC at 13. Although Time Warner asserts that this form of portability can be implemented "within about six months," it offers no support for this claim. The "Appendix B" referenced by Time Warner makes no mention of specific timeframes. GTE believes that a six-month timeframe is wholly unrealistic.

dismantle previous upgrades,"[32] in the absence of a chosen LNP architecture, such a statement is pure conjecture.

A good example of a potentially inefficient transition from interim to long term portability is embodied in the suggestion of both AT&T and MCI that the Commission adopt MCI's CPC portability plan as an interim solution and AT&T's LRN plan as the long term version.[33] The only feature common to both the MCI CPC plan and the AT&T LRN plan is their use an LNP database to store routing information. The two plans, however, are based upon significantly different routing principles.

The CPC plan routes calls on CPC+NXX where CPC identifies the service provider. Consequently, the switch must have separate CPC+NXX and NPA+NXX tables. In contrast, the LRN plan routes calls on NPA+NXX+XXXX, where the NPA+NXX+XXXX is uniquely assigned to a particular switch. Because of this fundamental difference in routing, applications developed for one scheme cannot be re-used to support the other scheme. Consequently, significant modifications would be required to transition from one scheme to the other. Thus, the overall costs associated with implementing CPC and later transitioning to LRN (including the quantification of any lost investments) must be determined before the CPC/LRN proposal can be fully evaluated.

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32 *Id.* at 14.

33 Comments of AT&T at 31; MCI at 15.

VI. AN ADVISORY BOARD OR INDUSTRY GROUP APPEARS TO BE NECESSARY IN ORDER TO OBTAIN NEEDED COST DATA

GTE is deeply concerned that many segments within the industry do not appear to be taking the issue of cost seriously. Whether this is because they are convinced that the LECs ultimately will be saddled with most of the costs or because they simply do not appreciate the gravity of the issue, the situation must be corrected. The form of long term number portability that will serve the public interest cannot be identified in a cost vacuum.[34]

As the substance of the opening comments demonstrate, the industry is high on rhetoric and low on answers. As previously discussed, despite the Commission's repeated request for cost data, virtually none was provided. Because the potential LEC competitors are apparently operating with a wide eye toward their future in this industry, it should not be surprising that their comments appear tainted, to one degree or another, with an element of pure self-interest. But self-interested posturing is not what the Commission needs. Hard data, particularly relative cost data, must be obtained in order for the Commission to intelligently address number portability. GTE urges the Commission to take the steps necessary to do this before reaching any final decision.

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[34] Another possibility may be the experience of these parties before some state commissions. BellSouth observes that "cost appears to be a secondary issue in some state number portability initiatives where it is only being considered after a number portability scenario is selected." Comments of BellSouth at 55. BellSouth goes on to correctly note that doing so "is analogous to a buyer selecting a car based solely on its looks and performance. While the buyer may select a car which meets all of his desires, he might not be able to afford to have all that he wants." *Id.*

For this reason, GTE endorses the concept of establishing an advisory board or appointing an industry group to generate the cost data associated with the various LNP proposals. Such data must include both the direct implementation costs as well an assessment of the overall network impact of various proposals. Although some may decry such a suggestion as a delaying tactic, these assertions will ring hollow if the Commission assumes an aggressive oversight role. GTE urges the Commission to establish clear and concise goals, realistic deadlines and frequent status reports. With this type of leadership, GTE is confident that the necessary information will be obtained in a timely and efficient manner.

VII. THERE IS A CONSENSUS THAT THE COMMISSION MUST ASSUME A LEADING ROLE IN ESTABLISHING NATIONALLY UNIFORM NUMBER PORTABILITY

There appears to be an overwhelming consensus in favor of the Commission assuming a leading role in guiding the industry toward nationally uniform number portability.[35] As reflected in its opening comments, GTE is part of this consensus.[36] By taking a leading role, the Commission can stimulate the industry to gather the cost data and technical information needed to answer the question of number portability. With this information the Commission can create

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35 *See, e.g.,* Comments of Ad Hoc at 8-9; AirTouch at 8-9; Ameritech at 3-4; ALTS at 10; AT&T at 9-10; Bell Atlantic at 10; CCTA at 3; CBT at 5-6; Jones at 2-3; MCI at 6; NCTA at 5; NYNEX at 2; PCIA at 7; TDS at 4; TRA at 10-13; TWC at 5-6; U S West at 4-5.

36 GTE Comments at 21.

a national blueprint for use by the states in deciding where and when to implement number portability within their borders.[37]

Respectfully submitted,

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[37] GTE does not share the view of ACTA that the Commission must preempt state involvement in order to carry out its function. Comments of ACTA at 6.

Commenting Parties

ACTA	America's Carriers Telecommunication Association
Ad Hoc	Ad Hoc Coalition of Competitive Carriers
AirTouch	AirTouch Paging and Arch Communications Group
ALTS	Association for Local Telecommunications Service
Ameritech	Ameritech
APCO	Association of Public-Safety Communications Officials-International, Inc.
AT&T	AT&T Corp.
BANM	Bell Atlantic NYNEX Mobile, Inc.
Bell Atlantic	Bell Atlantic Telephone Companies
BellSouth	BellSouth Corporation
CBT	Cincinnati Bell Telephone
CCTA	California Cable Television Association
Citizens	Citizens Utilities Company
CPUC	California Public Utilities Commission
CTA	Competitive Telecommunications Association
CTIA	Cellular Telecommunications Association
GCI	General Communication, Inc.
GO	Go Communications Corporation
GVNW	GVNW Inc./Management
ICC	Illinois Commerce Commission
ISA	Interactive Services Association
Jones	Jones Intercable, Inc.
Kahn	David L. Kahn
LDDS	WorldCom, Inc. d/b/a LDDS WorldCom
Marion	Marion County, Florida, 911 Systems Support Department
MCI	MCI Telecommunications Corporation
MFS	MFS Communications Company, Inc.
MPSC	Missouri Public Service Commission
NARUC	National Association of Regulatory Utility Commissioners
NCTA	National Cable Television Association, Inc.
NECA	National Exchange Carrier Association, Inc.

APPENDIX A

NENA	National Emergency Number Association
Nextel	Nextel Communications, Inc.
NTCA	National Telephone Cooperative Association
NWRA	National Wireless Resellers Association
NYNEX	NYNEX Telephone Companies
NYPS	New York Public Service Commission
Ohio	Ohio Public Utilities Commission
Omnipoint	Omnipoint Corporation
OPASTCO	Organization for the Protection and Advancement of Small Telephone Companies
Pac Bell	Pacific Bell
PCIA	Personal Communications Industry Association
PNI	Paging Network, Inc.
SBC	SBC Communications Inc.
PCS Primeco	PCS Primeco, L.P.
Sprint	Sprint Corporation
SCG	Scherers Communications Group
TAC	Texas Advisory Commission on State Emergency Communications
TDS	TDS Telecommunications Corp.
Teleport	Teleport Communications Group Inc.
TEC	The Ericsson Corporation
TIA	Teleservices Industry Association
TII	Telemation International, inc.
TRA	Telecommunications Resellers Association
TWC	Time Warner Communications Holdings, Inc.
USAI	U.S. Airwaves Inc.
US Intelco	U.S. Intelco Networks, Inc.
USTA	United States Telephone Association
USSB	United States Small Business Administration
U S West	U S West, Inc.
YPPA	Yellow Pages Publishers' Association